APPENDIX 2
PARAGRAPH 13.19 - LEISURE ZONE

Objection
598/1 13.19 Mr J Godden Rotunda Amusement Park

Issue
Should a casino be added to the list of examples in paragraph 13.19.

Inspector's Reasoning and Conclusions
13.1.36 I am satisfied that the RDD meets this objection.

RECOMMENDATION
13.1.37 No modification to paragraph 13.19.

POLICY FTC6 - LAND SOUTH OF MARINE PARADE

Objections
830/1 FTC6 Mr Russell Reilly
774/1 FTC6 Mr Andrew Burton
773/2 FTC6 Mr Andrew Hay KCC Youth Worker
747/6 FTC6 Luminar Leisure Drivers Jonas
762/10 FTC6 Sea Containers DPDS Consulting Group
772/12 FTC6 Mr Andrew Beggs, Chairman Local Assoc. of Estate Agents

Issues
Has the effect of noise on future residents been fully taken into account in the seafront policies.
Has the need to retain cheap family entertainment been ignored in the policy.
Should buildings north of Marine Parade be used for the new leisure zone, allowing the retention of the Rotunda and amusement park.
What assurance is there that the design of the leisure zone would be of high quality.

Inspector's Reasoning and Conclusions
13.1.38 I have dealt with the objection about the relationship between residential development and noise generating uses under the heading of Policy FTC4.

13.1.39 The policy proposes that the entertainment for families and young people, provided at reasonable cost by the Rotunda and amusement park at present, would be replaced and expanded by the facilities in the leisure zone. A Family Entertainment Centre is envisaged as well as other
more specialised attractions such as ten-pin bowling, and Policy LR15 identifies the bottom end of Tontine Street and the Old High Street as an area for new amusement centres. The new uses would provide employment to replace that provided by the existing activities.

13.1.40 The houses of Marine Crescent or Marine Terrace are listed and would not be a good location for conversion to a large-scale entertainment facility such as a laser world. In my view it is right that leisure uses be concentrated south of Marine Parade, and that the listed buildings remain in, or be converted to, residential use.

13.1.41 Criterion (a) of Policy FTC6, and other policies of the Plan, would ensure that the design of the leisure zone buildings would be of high quality, a prime requirement of the regeneration project which bears repeating for each policy. I do not find that the list of uses for the Leisure Zone in criterion (a)(ii) is over-prescriptive. The objector in relation to Policy FTC4 invokes the use of “should” as being appropriately flexible. I consider however that it is right to include an element of residential use at upper levels in the Leisure Zone, as suggested in the Comprehensive Development Framework, to add to the vitality of the area, to provide a true mix of uses and contribute to the housing target for Policy HO2A. I recommend accordingly.

13.1.42 I do not find that criterion (b) is too detailed. It merely indicates a pedestrian route strategy, which is essential to the success of the scheme to my mind.

13.1.43 Some form of vertical pedestrian transport up and down the Lens Cliff would be an essential feature of the Seafront redevelopment concept as a whole, in my view. It would encourage pedestrian movement between the Seafront area and the town centre, especially for those of limited mobility, and would reinforce the perception of the Seafront as an integral part of the attractions of central Folkestone. It is not right for Policy to explicitly require financial contributions however, and I recommend amended wording to criterion (c).

13.1.44 If the recommendation in relation to criterion (a)(ii) is accepted there is no need to refer to residential use also in criterion (e), which deals mainly with ground floor frontage uses. I do not find that criterion (f) is too detailed. A reference to density is essential and the remainder sets out broad indications of what would be required, to be fleshed out in a development brief.

13.1.45 There was much discussion at the inquiry about the viability of the Seafront and Harbour developments. I have taken all the evidence into account. I note that there is a revival of the housing market in general in Shepway and renewed interest in high-density quality residential development in the town centre, to which the forthcoming completion of the CTRL is likely to contribute whether or not trains stop at Folkestone. Such waterfront schemes have a particular attraction and have been successful elsewhere on the south coast. I see no reason why, in principle, the Seafront and Harbour sites would be unviable and thus undeliverable in the Plan period.

RECOMMENDATIONS

13.1.46 Modify Policy FTC6 by adding to criterion (a)(ii), after “attractions” “, and residential use above ground floor level.”.

13.1.47 Modify Policy FTC6 by deleting criterion (c) and replacing with “The Council will seek planning obligations in relation to improvement to the existing Lens Cliff steps and towards the provision of a new lift or similar means of public vertical transportation up the Cliff (see also Policy FTC4).”.

266
POLICY FTC7 - UNDERCLIFFE SITE

Objections
7437 FTC7 Luminar Leisure Drivers Jonas nfs
772/13 FTC7 Mr Andrew Beggs, Chairman Local Assoc. of Estate Agents NFS

Issues
Has the effect of noise on future residents been fully taken into account in the seafront policies.
Would sea views from Marine Crescent be preserved.

Inspector's Reasoning and Conclusions
13.1.48 I have dealt with the objection about the relationship between residential development and noise generating uses under the heading of Policy FTC4.
13.1.49 I consider that the preservation of views of the sea from Marine Crescent would be secured by criterion (f) of Policy FTC6, and by the emphasis on the requirement for a high quality of development that runs through all the seafront site policies. Buildings at Marine Crescent are listed, which will afford further protection to the setting of this important part of the seafront townscape.

RECOMMENDATION
13.1.50 No modification to Policy FTC7.

POLICY FTC8 - OVERCLIFFE SITE

Objections
772/14 FTC8 Mr Andrew Beggs, Chairman Local Assoc. of Estate Agents NFS
571/7 FTC8 Go Folkestone NFS
871/19 FTC8 Mr Mike Simmonds Michael Simmonds Associates NFS

Issues
Could the policy include a science park featuring William Harvey.
Is it right to limit development on the cliff top to single storey.

Inspector's Reasoning and Conclusions
13.1.51 Criterion (a)(ii) of the policy would permit leisure and tourism uses at the site, which could include an attraction such as a science park featuring William Harvey. Alternatively such a use might be suitable for the leisure zone at the eastern end of policy area FTC6.
13.1.52 Policy area FTC8 is at a key location between the town centre, including the Bouverie Place development, and the seafront sites. Criterion (c) of the policy would provide for a new vertical link up the cliff, which could indeed involve a novel form of public transportation such as a cable car. This would be the only place along the cliff top, apart from at the Leas Cliff Hall, where there would be building between The Leas and the cliff edge. It should therefore be
treated with particular sensitivity. To my mind the key aims of policy should be to maintain the strong relationship between The Leas and the sea by retaining public views through the site, as well as to preserve the setting of the War Memorial and to provide a focus to draw people down to the seafront from the town centre. A simple limitation of storey height would not necessarily secure the fulfilment of these aims, and in fact an uninterrupted stretch of single storey development at the cliff edge might fail to achieve any of them. To this end therefore I consider that a limited part of the cliff top development could be of more than one storey in height, in the form of a landmark or gateway feature, and that a more flexible form of wording should be incorporated in the policy as recommended below, with consequential amendment to paragraph 13.28.

RECOMMENDATIONS

13.1.53 Modify Policy FTC8 by deleting the second sentence of criterion (b) and replacing it with “The height and form of development at the top of the cliff should retain public views through the site, preserve the setting of the War Memorial and provide a focus to draw people down to the seafront from the town centre.”

13.1.54 Modify paragraph 13.28 by carrying out consequential amendments to sentence 4.

POLICY FTC9 - HOTEL BURSTIN

Objections
747/8 FTC9 Luminar Leisure Drivers Jonas nfs
772/15 FTC9 Mr Andrew Beggs, Chairman Local Assoc. of Estate Agents NFS

Issues

Has the effect of noise on future residents been fully taken into account in the seafront policies.

Would the opening of Lower Sandgate Road and Marine Terrace to two-way traffic be harmful to Marine Crescent.

Inspector's Reasoning and Conclusions

13.1.55 I have dealt with the objection about the relationship between residential development and noise generating uses under the heading of Policy FTC4. The same comments would apply to hotel or other tourist accommodation.

13.1.56 I consider that the removal of traffic from the area east of the Burstin Hotel would allow the opportunity for considerable enhancement of the setting of the harbour and the reinforcement of pedestrian links between the seafront and the lower part of the town centre. I have no evidence that the opening of Lower Sandgate Road and Marine Terrace to two-way traffic would be harmful to the setting of Marine Crescent or the environmental improvement of the area.

RECOMMENDATION

13.1.57 No modification to Policy FTC9.
**RECOMMENDATION**

3.1.300 No modification to Policy HO2.

---

**POLICY HO2A - FOLKESTONE SEAFRONT**

**Objections**

<table>
<thead>
<tr>
<th>Objection</th>
<th>Name</th>
<th>Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>114/1</td>
<td>HO2 A</td>
<td>Dr David Price</td>
</tr>
<tr>
<td>686/1</td>
<td>HO2 A</td>
<td>Mr Andrew Craven Kent Wildlife Trust</td>
</tr>
<tr>
<td>747/2</td>
<td>HO2 A</td>
<td>Luminar Leisure Drivers Jonas</td>
</tr>
<tr>
<td>754/2</td>
<td>HO2 A</td>
<td>Mr A Ingleston</td>
</tr>
<tr>
<td>388/19</td>
<td>HO2 A</td>
<td>Pentland Homes Ltd Charles Evans</td>
</tr>
<tr>
<td>484/8</td>
<td>HO2 A</td>
<td>Mr P Garber, Planning Director George Wimpey UK</td>
</tr>
<tr>
<td>489/2</td>
<td>HO2 A</td>
<td>Folkestone Development Company R Stevenson, John Bishop &amp; Associates</td>
</tr>
<tr>
<td>530/1</td>
<td>HO2 A</td>
<td>Kingston Homes Ltd Mr R Stevenson</td>
</tr>
<tr>
<td>739/1</td>
<td>HO2 A</td>
<td>Mr Chris Kneale Southern Water</td>
</tr>
<tr>
<td>748/12</td>
<td>HO2 A</td>
<td>Kent County Council Peter Cooper,</td>
</tr>
<tr>
<td>751/38</td>
<td>HO2 A</td>
<td>Ms Claerwyn Lock, The Environment Agency</td>
</tr>
<tr>
<td>824/2</td>
<td>HO2 A</td>
<td>Mrs V Collins</td>
</tr>
<tr>
<td>870/10</td>
<td>HO2 A</td>
<td>Folkestone Development Company Ltd Jennifer Owen Associates</td>
</tr>
<tr>
<td>873/3</td>
<td>HO2 A</td>
<td>Mr &amp; Mrs M Walker Jennifer Owen Associates</td>
</tr>
<tr>
<td>552/2</td>
<td>HO2 A</td>
<td>Mr S J Richardson Mr R Stevenson</td>
</tr>
<tr>
<td>762/12</td>
<td>HO2 A</td>
<td>Sea Containers DPDS Consulting Group</td>
</tr>
</tbody>
</table>

**Issue**

Whether the proposed scale and mix of uses is deliverable within the plan period with particular regard to dwelling density, provision of adequate vehicular and pedestrian access and effect of provision of leisure elements on the provision of housing.

**Inspector's Reasoning and Conclusions**

3.1.301 Policy HO2A builds on the strategies of the Comprehensive Development Framework (CDF) of 2000, produced by the District Council and SEEDA (CD4.07). The Seafront is previously-developed land in what is probably the most sustainable location in the District. It therefore comes at the top of the sequential ladder of PPG3. It is precisely by developing such areas first that the Council will avoid, as far as possible, development on greenfield sites and those of wildlife importance. Government policy requires that the best use be made of urban land, and the Seafront is an area which could accommodate a high density of development. Overall the capacity of Site HO2A may well be in excess of 500 dwellings and this is recognised in both the Urban Capacity Study (CD1.08) (the UCS) and the CDF. The Local Planning Authority hold that the total of 500, and its distribution between the two phases of the Plan, is the optimum deliverable within the Plan period. However I have no firm evidence to show that the total capacity of the site, which could be over 700 dwellings, could not be delivered within that time. In my view setting an unambitious target might prejudice making the best use of this land. In particular I consider that residential use above ground level in the leisure zone, as suggested in the CDF, could add to the vitality of the area as well as contributing to the housing
total, and I recommend on that under Policy FTC6. Adding a phrase such as “at least” or “more than” to the policy, or leaving the exact number to the design of a detailed scheme, would not solve the problem, in my view, as it is vague and gives insufficient certainty to developers. I conclude therefore that the Council should reconsider the total number of dwellings to be provided on Site HO2A, and revise it upwards towards the capacity indicated in the UCS.

3.1.302I understand that the Council is in negotiation with the various owners of Site HO2A and that there are no significant problems of land assembly or delivery. Planning permission for residential development was granted in 1989 but was not implemented. However, that predated the CDF and took place in a different economic climate. There have been several examples nationally of high quality, mixed-use coastal or waterside development realised since then and I see no reason why, in principle, the strategy at Folkestone Seafront would not be carried out.

3.1.303It is likely that a development of this size would generate demand for a number of primary and secondary school places, and there is little capacity nearby. The Local Planning Authority should ensure that adequate provision is made for primary provision on or off-site, and secondary provision off-site, by means of developer contributions as appropriate. I have no evidence that sewerage capacity in the area is so limited as to preclude development in principle here. This is a matter for further investigation and could also be the subject of developer contributions if necessary.

3.1.304Existing leisure and parking facilities and the Sunday Market would be replaced by new indoor leisure facilities which will provide year-round benefits for Shepway residents and visitors, together with appropriate parking provision. The Seafront is a key site in the regeneration of the town centre and development of high quality will be required, as emphasised in the CDF. Imaginative design should have no difficulty in both reflecting the coastal situation of the site and enhancing the setting of the listed buildings nearby. Proposals for residential development would have to take into account existing and proposed noise-generating uses, and include schemes for mitigation as necessary. The Plan should be read as a whole, and Policies SD1(k) and U16 would protect the living conditions of residents. A successful relationship between leisure and residential uses should be an important aim of good design in the area.

3.1.305A habitat survey of the coastal area has been undertaken in connection with the flood defence improvement works currently under way, but has not revealed sensitive ecological issues in the Policy HO2A area. It is important however that the impact, direct and indirect, of development is fully assessed at the planning application stage. It may be that the scale of development would indicate that an Environmental Impact Assessment is required. In any event, the wildlife value of the area would be protected under Policy SD1(d) and (i)-(iii), and by various nature conservation policies of the Plan. The site is not at risk from tidal flooding but the RDD ensures that flood risk matters will be fully taken into account by including, rightly in this case, a cross-reference to the flooding policies of the Plan. Measures to ensure the protection of buildings from wind or wave-borne debris may be incorporated into a development brief for the area and assessed at the planning application stage.

RECOMMENDATIONS

3.1.306The Council should consider increasing the dwelling total of Policy HO2A towards that indicated in the Urban Capacity Study, to make the best use of this brownfield site at an early stage as possible in the Plan period.

3.1.307The Council should ensure that adequate provision for primary education is made, on or off-site, by means of developer contributions as appropriate. If provision on-site is found to be the best solution then this should be incorporated into Policy HO2A and the Proposals Map, and/or into the development brief for the site. The brief should also include reference to